IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

	X
	:
JOSEPH MICHAEL ARPAIO	:
Plaintiff, v.	: Case No. 1:18-cv-02387-APM
MICHELLE COTTLE, et al.	: :
Defendants.	: :
	X

CONSENT MOTION TO EXTEND TIME TO FILE REPLY MEMORANDA IN FURTHER SUPPORT OF DEFENDANTS' MOTION TO DISMISS AND SPECIAL MOTION TO DISMISS

Defendants Michelle Cottle and The New York Times Company, incorrectly sued as "New York Times" (together, "The Times") by and through their undersigned counsel, hereby file this consent motion to extend the deadline to file reply memoranda in further support of their motion to dismiss (Dkt. 8) and special motion to dismiss (Dkt. 9), and in support of which The Times states as follows:

- 1. The Times consented to Plaintiff's January 17, 2019 motion for a 21-day extension of time to respond to The Times's motion to dismiss and special motion to dismiss "on the condition that [The Times] have an additional two weeks to file a reply, which Plaintiff agree[d] to." Dkt. 10 at 1.
- Although the Court granted Plaintiff's consent motion, its January 17, 2019
 Minute Order reset the deadline for Plaintiff's responses but not the deadline for The Times's replies.

3. The Times therefore, in an abundance of caution, seeks a separate order entering the previously requested two-week extension of the deadline to file its reply memoranda.

- 4. Providing The Times with the requested relief will not prejudice either party.
- 5. Plaintiff consents to this motion.

WHEREFORE, for the reasons stated above, The Times respectfully requests that this Court enter an Order:

A. Extending The Times's deadline to file reply memoranda in further support of its motion to dismiss and special motion to dismiss to March 1, 2019; and

B. Providing the parties any further relief deemed necessary and appropriate by this Court.

Dated: February 11, 2019 Respectfully submitted,

BALLARD SPAHR LLP

<u>/s/ Jay Ward B</u>rown

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of February 2019, a true and correct copy of the foregoing was filed with the Court through the electronic filing system, which will automatically serve electronic notice of the same on all counsel of record.

______/s/ Jay Ward Brown
Jay Ward Brown

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JOSEPH MICHAEL ARPAIO Plaintiff,	: : : : Case No. 1:18-cv-02387-APM
v.	:
MICHELLE COTTLE, et al.	· : :
Defendants.	: :
	: X
[PROPOSED] ORDER	
UPON CONSIDERATION OF Defendants M	Michelle Cottle and The New York Times
Company's Consent Motion to Extend Time to File	Reply Memoranda in Further Support of
Their Motion to Dismiss and Special Motion to Dis-	miss, and good cause being shown for the
relief requested therein, it is this day of	, 2019, by the United States
District Court for the District of Columbia, hereby	
ORDERED, that the motion be and is hereby O	GRANTED; and
ORDERED, that Defendants Michelle Cottle	and The New York Times Company shall
file their reply memoranda on or before March 1, 2019	9.
Indea II C Dist	wiat Count for the District of Columbia
Judge, U.S. Dist	rict Court for the District of Columbia

Copies to:

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